

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Romell Lemoyne Goodson

Case: 2:23-mj-30208

Assigned To : Unassigned

Assign. Date : 5/23/2023

CMP: SEALED MATTER (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of April 26, 2023 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

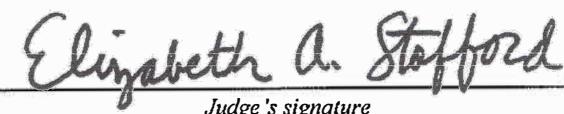
<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Felon in Possession of a Firearm

This criminal complaint is based on these facts:
see attached affidavit.

Continued on the attached sheet.


Complainant's signature

Kylie A. Churches, Task Force Officer (ATF)
Printed name and title


Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge
Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: May 23, 2023

City and state: Detroit, Michigan

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR
A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Kylie A. Churches, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND OFFICER BACKGROUND

1. I am a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered by law to conduct investigations and make arrests of offenses enumerated under federal law.
2. I have been a Task Force Officer with ATF since March 2022, and I have had extensive law enforcement training, including my training at the Detroit Police Department Training Center. In addition to being a Task Force Officer with the ATF, I have been employed as a police officer with the City of Detroit for approximately four years. I also have a bachelor’s degree in Criminal Justice.
3. As an ATF Task Force Officer, I have authored numerous state search warrants, state criminal complaints, and state arrest warrants.
4. As an ATF Task Force Officer, I have participated in numerous criminal investigations, including investigations involving firearms, armed drug trafficking, and criminal street gangs. I am familiar with, and have experience

using, a variety of investigative techniques and resources, including physical and electronic surveillance, undercover and various types of informants, and cooperating sources. Through these investigations, my training and experience, and conversations with other agents and other law enforcement personnel, I have become familiar, not only with firearms violations, but also with methods used by gang members and drug traffickers to smuggle and safeguard controlled substances, and to distribute controlled substances, and to collect, launder, hide, disguise or conceal related proceeds. I am familiar with methods employed by gang members and large narcotics organizations to attempt to thwart any investigation of their criminal activity. These tactics, employed in part to evade law enforcement, include their criminal use of and association with multiple residences, multiple cellular phones, counter surveillance, smuggling schemes, false or fictitious identities, coded communications and conversations and the use of firearms to ensure facilitation of the illegal activity.

5. The statements contained in this affidavit are based, in part, on my review of written police reports by the Detroit Police Department. This affidavit also includes information provided to me by and/or through other law enforcement agents, investigators, and individuals with knowledge of this matter, my investigation, and the review of documents.

6. This affidavit establishes probable cause that Romell Lemoyne GOODSON (DOB: XX/XX/1976) violated 18 U.S.C. § 922(g)(1), as a felon in possession of a firearm. This affidavit does not include all the information known to law enforcement related to this investigation.

PROBABLE CAUSE

I. Case Background

7. On April 26, 2023, at approximately 3:09 AM, Detroit Police Department (DPD) Officers Anderson and Palmer were on patrol in the area of West Chicago and Greenfield. The officers pulled into a Citgo gas station for extra patrol because the location was known for robberies, shootings, carjackings, illegal narcotic sales, and illegally armed persons in the area. The officers observed GOODSON look behind him and when he observed the marked police car pull into the Citgo gas station, he clutched the front pocket of his sweatshirt and bladed his body away from the marked police car. The officers observed a bulge in GOODSON's front hoodie pocket which, based on their training and experience, resembled a firearm.

8. Officer Palmer approached GOODSON and asked if he was armed and GOODSON stated "Yes, but it's my friend's." Officer Palmer recovered a Taurus 85 Protector Polymer Revolver .38 caliber, serial number JU47685, loaded with 5 .38 live rounds, from GOODSON's front hoodie pocket and detained

GOODSON. The officers conducted a Concealed Pistol License (CPL) query via the Law Enforcement Information Network (LEIN). The LEIN results revealed GOODSON did not have a valid CPL. Subsequently, GOODSON was arrested for Carrying a Concealed Weapon.

9. GOODSON was then transported to the Detroit Detention Center without incident for housing.

II. Criminal History

10. I reviewed GOODSON's computerized criminal history report via LEIN, and the results reflected that GOODSON was convicted for the following felony offenses:

- a. 1997: 6th Circuit Court – Oakland County: Felony Armed Robbery – Pled Guilty
- b. 2002: 3rd Circuit Court – Wayne County: Felony Stolen Property – Receiving/Concealing - \$1,000 or more but less than \$20,000 – Pled Nolo Contendere
- c. 2005: 6th Circuit Court – Oakland County: Felony Armed Robbery – Pled Guilty
- d. 2005: 6th Circuit Court – Oakland County: Felony Armed Robbery – Pled Guilty
- e. 2018: 3rd Circuit Court – Wayne County: Felony Weapons – Firearms – Possession by Felon – Pled Guilty
- f. 2018: 3rd Circuit Court – Wayne County: Felony Weapons – Carrying Concealed – Pled Guilty

- g. 2018: 3rd Circuit Court – Wayne County: Felony Weapons Felony Firearm – Pled Guilty
- h. 2018: 16th Circuit Court – Macomb County: Felony Controlled Substance – Possess (Cocaine, Heroin or Another Narcotic less than 25 Grams) – Pled Guilty
- i. 2018: 16th Circuit Court – Macomb County: Felony Weapon – Miscellaneous – Pled Guilty

11. As a result, I know that GOODSON is prohibited under federal law from possessing firearms.

12. GOODSON knew he was a felon and that he had been convicted of a crime punishable by imprisonment for a term exceeding one year because he was sentenced to 10 to 30 years' imprisonment for Armed Robbery in 2005 and to 2 years' imprisonment in 2018 for Felony Firearms.

13. ATF Special Agent Rambus, a firearms interstate nexus expert, was advised of the recovered Taurus 85 Protector Polymer Revolver, .38 caliber and serial number JU47685. S/A Rambus advised that based on the identifiable characteristics, without physically examining the Taurus 85 Protector Polymer Revolver .38 caliber, serial number JU47685, and his training and experience, the firearm meets the federal definition of a firearm and that it was manufactured outside the State of Michigan and therefore traveled in interstate and/or foreign commerce.

CONCLUSION

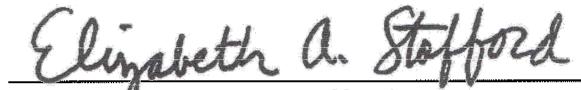
14. Based on the above facts, there is probable cause to believe that on April 26, 2023, while in the Eastern District of Michigan, Romell Lemoyne GOODSON, a convicted felon and knowing that he was a convicted felon, was in possession of the above-described firearm, said firearm having traveled in interstate commerce, in violation of 18 U.S.C. § 922(g)(1) – felon in possession of a firearm.

Respectfully submitted,



Kylie A. Churches, Task Force Officer
Bureau of Alcohol, Tobacco, Firearms
and Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means.



Hon. Elizabeth A. Stafford
United States Magistrate Judge

Dated: May 23, 2023